

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 04-10334-RWZ
	)	
JEFFREY HOLLIDAY	)	

MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant Jeffrey Holliday respectfully moves to modify his conditions of release to permit him to travel to Orlando, Florida for Thanksgiving week, and, more generally, to extend his permissible travel to the continental United States, upon prior notice to Pretrial Services.

As grounds for this motion, defendant states that he is charged with theft of government property. He is on release and, as part of the release conditions, his travel was restricted to the New England states. Since his release, defendant has been in compliance with his conditions of release.

Defendant wishes to travel to Orlando, Florida with his fiancé, Kathleen Haynes, for Thanksgiving week, to leave on Saturday, November 20 and return on November 28, 2004. His fiancé's daughter, and hopefully his own daughter Katherine, would travel with him. They would make accommodations, if this Court permits the travel, and promptly notify the Court of the itinerary.

More generally, defendant asks the Court to extend his permissible travel to the continental United States, upon prior notice to Pretrial Services.

The government, by Assistant United States Attorney Paul Levenson, has no objection to this request. Pretrial Services, by John Riley, has no objection to this request.

JEFFREY HOLLIDAY

By his attorney,

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Charles P. McGinty

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Dated: November 12, 2004